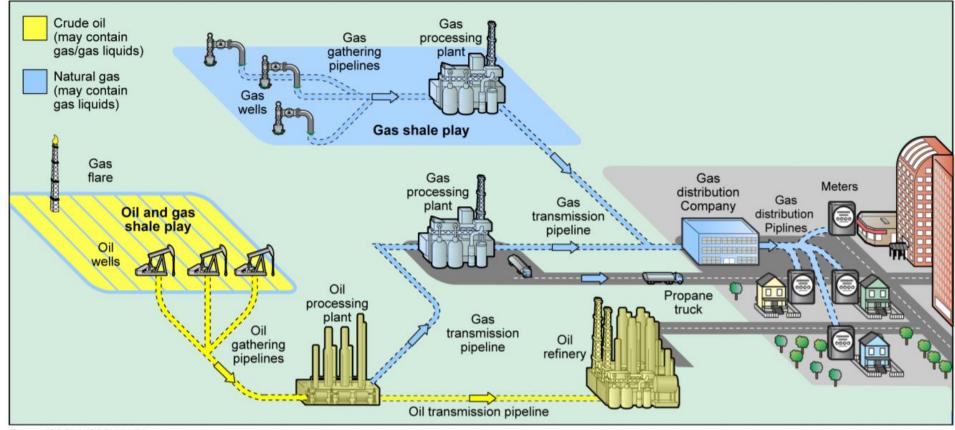
GAS GATHERING LINES

STEVEN GIAMBRONE LDNR, PIPELINE SAFETY

Gathering Function



Source: GAO. | GAO-17-639

Note: Oil products are also transmitted from the refinery through transmission pipelines to storage tanks and other facilities not depicted in this figure.

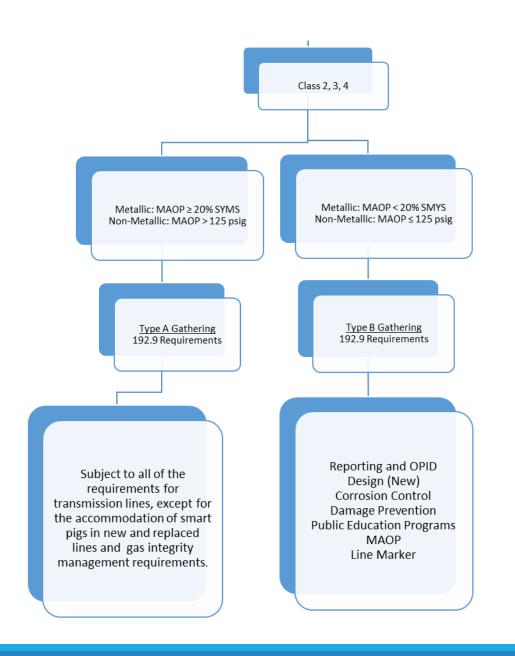
Gathering Lines - 2006

>Type A

- ➤ Metallic, MAOP produces hoop stress ≥ 20% SMYS
- ➤ Non-metallic with MAOP >125 psig
- Class 2, 3, or 4 locations

>Type B

- ➤ Metallic with MAOP produces hoop stress < 20% SMYS
- Non-metallic with MAOP ≤ 125 psig
- ➤ Class 3 and 4, Class 2 by one of three methods (cluster)



MAOP Determination

- ➤ MAOP is calculated by using 192.619 Maximum allowable operating pressure: steel or plastic pipelines
- MAOP is affected by: Class location, design of pipe and components, system pressure, operating history, overpressure protection
- MAOP cannot exceed the LOWEST of: Design pressure, Test Pressure (de-rated), or MOP during the 5 years preceding applicable date.
- ➤ MAOP Plastic Pipe (Design of Pipe)

$$\triangleright P = \left(\frac{2S}{SDR - 1}\right) xDF$$

➤ MAOP Steel Pipe (Design of Pipe)

$$\triangleright P = \left(\frac{2St}{D}\right) x F x E x T$$

MAOP and SMYS Example

Steel Gathering – Constructed in 2008, 8" Grade B, .322 wall thickness, Installed in Class 1 location, Valves/fittings ANSI 300, Tested to 650 psig for 8 hours, operated at 350 psi in 2019.

- ➤ Design pressure $-P = \left(\frac{2St}{D}\right)xFxExT = 1,881$ psi
 ➤ Fittings ANSI 300 = 740 psi
- Test Pressure/Class Location Factor = (650 psi) / 1.1 = 590 psi
- ➤ Newly regulated gathering lines MOP during the five years prior to the date becomes regulated
 - \rightarrow MAOP by grandfather 192.619(a)(3) = 350 psi

^{*}If this line had no design or pressure test information the MAOP would be 350 psi

MAOP and SMYS Example

Steel Gathering – Constructed in 2008, 8" Grade B, .322 wall thickness, Installed in Class 1 location, Valves/fittings ANSI 300, Tested to 650 psig for 8 hours, operated at 350 psi in 2019.

- ➤ Determine if MAOP of 590 psi creates a Hoop Stress greater or less than 20% SMYS
- ➤ Grade B SYMS is 35,000 psi
- \geq 20% of 35,000 psi = 7,000 psi
- ➤ Use Barlow's Formula: $P = \frac{2St}{D} = \frac{2x7,000x.322}{8.625} = 523 psi$
- A pressure of 523 psi will produce a hoop stress 20% of SMYS. So, an MAOP of 590 psi creates a hoop stress greater than 20% of SMYS.

NPRM; 4/16/2016

- All gas gathering lines subject to annual and incident reports
- New category of regulated gathering lines
 - ➤ Class 1
 - ➤ Diameter 8" or greater
 - > High-pressure
 - ➤ Metallic with MAOP ≥ 20% of SMYS
 - ➤ Non-metallic MAOP > 125 psi
- >Approximately 90,000 miles affected.

Gas Gathering Final Rule 11/15/2021

- Subject all gas gathering lines, including previously unregulated lines, to PHMSA annual and incident reporting requirements (estimated > 425,000 miles of pipeline nationally)
 - ► LA between 4,000 and 6,000 miles, and a number of new operators
- Limit the use of the incidental gathering line exception to lines 10 miles or less. No other definition changes adopted.

Gas Gathering Final Rule 11/15/2021

Previously-unregulated gathering pipelines (SMYS >20% in Class 1 areas) now subject to safety standards:

- Approximately 90,000 additional miles of pipe subject to damage prevention, and emergency planning requirements.
- 20,000 additional miles of pipe subject to public awareness, line marker, corrosion control and leak survey requirements.
- 14,000 additional miles of pipe subject to MAOP requirements.
- All new and replaced pipe 8" or greater will have to be constructed in accordance with the current pipeline safety regulations.

Gas Gathering Final Rule 11/15/2021

Added two new categories of gathering line - Type C & Type R

Effective Date – May 16, 2022

➤ Incident reporting after this date

Annual Reports – Due March 15, 2023

Type C lines identified by November 16, 2022

Compliance with safety standards by May 16, 2023

Type C Exception

192.9(f)(1)Pipeline <16" diameter may apply a PIR exception

Allows operators to parse line if one of the following

- ➤ Method 1 no building for human occupancy or other impacted site located in PIR
- Method 2 the segment is not located in a class location unit containing a building intended for human occupancy or other impacted site

Type C Exception

Both methods use:

➤ Buildings suitable for human occupancy such as houses, office buildings, stores, restaurants, factories, etc.

Other impacted sites include

- Small, well-defined outside area occupied by 20 or more persons at least 5 days/week for 10 weeks (days and week do not need to be consecutive) ball fields, playgrounds, picnic areas, rest areas
- Any portion of paved surface of designated interstate, other freeway or expressway or other principal arteria road with 4 or more lanes

Type C Exceptions – Method 1

PIR – Potential impact radius as defined in §192.903

 $PIR = .73*d*p^{1/2}$

d = diameter

p = pressure

PIR = radius in feet

.69 is the safety factor for natural gas

.73 safety factor for production or high BTU gas

Type C Exceptions – Method 2

Class unit defined in §192.5

Extends 220 yards on either side of the centerline of any continuous 1 miles of pipeline

Type C

Pipelines diameter 8.625" through 16" with no PIR exception and all pipelines >16" must also have:

- ➤ Public Awareness Plan according to §192.616
 - Follow requirements of API RP 1162 (1st edition, IBR)
- ➤ Install line markers according to §192.707
 - Name of operator, product, warning, and 24 hour emergency number

Type C – Additional Requirement

Pipelines diameter 8.625" through 16" with no PIR exception and all pipelines >16" must also have:

- Corrosion Control according to §192 Subpart I
 - ➤Only for metallic pipe
- Leakage survey according to §192.706
 - ➤ Instruments not required for Class 1 locations
- Fix hazardous leaks as per §192.703(c)

Type C - More Requirements

Pipelines > 12.75" through 16" with PIR and all pipelines > 16"

- > Follow Plastic Pipe requirements
 - Design, joining, qualification of joiners
- Establish Maximum allowable operating pressure (MAOP) according to §192.619
 - May use maximum pressure for 5 years prior to becoming regulated

Type C

Not required to have:

- ➤ Operator Qualification Plan
- ➤ Integrity Management Plan
- National Pipeline Mapping System
- Exempt from certain design, construction and testing requirements – mostly records requirements

Type R Gathering Lines

- >§192.8 defines Type R as all other onshore gathering lines, specifically in Class 1 and Class 2 locations
 - ➤ Class 1 < 8" in diameter, no pressure limitation
 - ➤ Class 2 location outside of Area 2 (b) and (c) definitions
- Type R gathering line is subject to the reporting requirements under Part 191, but is not a regulated gathering line.

Type R Requirements

- §191.5 Immediate notice of certain incidents
- Incident defined in §191.3
- ➤ Call within 1 hour of confirmation to NRC
- §191.15 Transmission Systems; gathering systems: Incident report
- Written report within 30 days of incident using PHSMA Form F 7100.2

Type R Requirements

- §191.22 National Registry of Operators
- ➤ OPID request PHSMA Form F 1000.1
- §191.17 Transmission Systems; gathering systems; ...: Annual Report
 - ➤ Due March 15 of every year
 - First annual report due March 15, 2023 for lines operated in 2022
 - >Send annual reports to pipelineinspectors@la.gov

Compliance Deadlines

Rule effective May 16, 2022

- ➤ Determine Type C by November 16, 2022 (§192.8)
 - >2022 annual report due March 15, 2023
- Existing pipelines must comply with requirements by May 16, 2023

Compliance Deadlines

- ➤ Newly regulated Type C one year for compliance
 - PHMSA will exercise regulatory enforcement discretion to refrain from taking enforcement action until May 17, 2024 against operators of existing Type C gas gathering pipelines with an outer diameter greater than or equal to 8.625", but less than or equal to 12.75"
 - ➤ Operators are still required to file annual reports in March 2023

